
In the Matter of the Complaint of
JESSICA SNOW
3524 Cornerstone Street
Round Rock, TX 78681
against MATTHEW A. KEZHAYA,
a Minnesota Attorney,
Registration No. 0402193.

**DETERMINATION THAT
DISCIPLINE IS NOT
WARRANTED, WITHOUT
INVESTIGATION**

To: Jessica Snow:

After reviewing the documents you submitted, the Director has determined not to investigate your complaint. The reasons for the Director's decision not to investigate this complaint are as follows:

Complaint Summary

Attorney Matthew Kezhaya represents the opposing party in a recent matter involving a video you posted on TikTok. Specifically, Mr. Kezhaya represents The Satanic Temple, and you operate a TikTok channel under the name "The Satanic Housewife." On your TikTok channel, you posted a video discussing The Satanic Temple. After you posted this video, Mr. Kezhaya sent you a cease-and-desist letter dated June 9, 2022, requesting that you issue specific corrections and retractions. On June 17, 2022, after additional communications with Mr. Kezhaya regarding the specific language to be included in the video, you posted a correction and retraction video to your TikTok channel.

On June 23, 2022, you submitted the instant complaint regarding Mr. Kezhaya. You believe that Mr. Kezhaya acted improperly by using your legal name and address in the cease-and-desist letter and sending the letter to multiple email addresses. You also believe that Mr. Kezhaya did not convey this letter to you via U.S. mail or other social media platforms as the letter indicates because you have no record of receiving the letter in these formats and you have blocked messages on some of these social media platforms. You also believe that the requested correction and retraction video contained untrue statements and that Mr. Kezhaya routinely makes disparaging comments about other people on social media and in other court matters, such as referring to people as "idiots" or believing "idiot-conspiracy theories."

Reasons for Decision Not to Investigate

Rule 8(a), Rules on Lawyers Professional Responsibility, adopted by the Minnesota Supreme Court, states that "upon a reasonable belief that professional

misconduct may have occurred, the Director may make such investigation as the Director deems appropriate.” Your complaint does not state a basis for a reasonable belief that misconduct may have occurred.

First, Mr. Kezhaya did not act improperly by using your legal name and address in conveying the cease-and-desist letter or in conveying the letter in multiple manners. Mr. Kezhaya took reasonable steps to notify you of his client’s demand, as he was required to do. As you are not his client, Mr. Kezhaya has no duty of confidentiality to you and there is nothing to suggest Mr. Kezhaya’s actions were done with the sole purpose to burden or harass. The email addresses identified in the letter were affiliated with you pursuant to a public records search and were all returned to Mr. Kezhaya as undeliverable except for the email address you used in additional communication with Mr. Kezhaya.

Second, you also allege that Mr. Kezhaya’s statement that the cease-and-desist letter was also sent to you via other social media platforms and by U.S. mail is false. Further, that you did not receive the letter through these other means does not mean Mr. Kezhaya lied. Only eight business days elapsed between the date of the cease-and-desist letter and submitting the instant complaint. This is insufficient to show that Mr. Kezhaya was untruthful regarding the means by which he attempted to convey the cease-and-desist letter to you. The Director notes that you also state that you have blocked the receipt of messages on some of these platforms, meaning you would not have received the letter on those platforms. Your complaint does not provide a reasonable basis to believe Mr. Kezhaya knowingly made a false statement.

Third, although you believe that some of the statements in the correction and retraction video requested by Mr. Kezhaya are untrue and that his request that you make these statements is akin to assisting you in making false testimony, lawyers, such as Mr. Kezhaya in this matter, routinely represent parties in disputes and may rely on their clients’ version of the facts. Moreover, lawyers may state facts in a light favorable to clients without that being taken as a lie and may, and should, aggressively pursue their clients’ aims. The factual dispute between you and The Satanic Temple regarding statements in your original video and in the correction and retraction video is the very basis of the legal dispute, and Mr. Kezhaya did not act improperly by representing his client’s version of the facts. Further, you were free to accept or reject The Satanic Temple’s demand to post a correction and retraction video, and it appears you accepted this resolution and posted the requested video. The more appropriate forum for contesting the requested resolution of the cease-and-desist letter would be civil litigation, and the Director’s Office declines to be the forum in the first instance to determine whether your original video contained false, defamatory, or actionable statements as stated in the cease-and-desist letter, or whether the requested correction

and retraction video contained true statements tailored to the harm caused by the original video.

Finally, although you believe that Mr. Kezhaya has used disparaging language on social media and other forums about people and matters unrelated to this conflict about your TikTok video, this is not grounds for discipline. If an attorney is rude, uses harsh language, or exhibits bad manners, such conduct would fall short of the profession's best standards. However, it would ordinarily not violate a Rule of Professional Conduct.

The Director's Office is limited to investigating complaints of unprofessional conduct and prosecuting disciplinary actions against attorneys. It cannot represent you in any legal matter or give legal advice. You must retain an attorney if either legal advice or representation is desired.

NOTICE OF RIGHT TO APPEAL

If you are not satisfied with the Director's determination not to investigate this complaint, an appeal may be made by notifying the Director in a letter postmarked no later than fourteen (14) days after the date of this notice. The letter of appeal should state the reason(s) why you believe the matter should be investigated. A Lawyers Professional Responsibility Board member will review the appeal. The Lawyers Board is comprised of 14 lawyers and 9 non-lawyers appointed by the Minnesota Supreme Court. Appeals are assigned to individual Lawyers Board members in rotation according to when they are received. The Board members' options on appeal are limited to either approving the Director's decision not to investigate the complaint or directing that the complaint or some portion of the complaint be investigated. This determination will generally be based upon the information which is already contained in the file.

Mr. Kezhaya is, by way of a copy of this determination and your complaint, being notified of your complaint and our decision not to investigate.

Binh Tuong (for) Tuong, Binh
Jun 30 2022 8:47 AM

SUSAN M. HUMISTON
DIRECTOR OF THE OFFICE OF LAWYERS
PROFESSIONAL RESPONSIBILITY
445 Minnesota Street, Suite 2400
St. Paul, MN 55101-2139
(651) 296-3952

cc: Matthew A. Kezhaya

From: NO REPLY StateBar@courts.state.mn.us
 To: Resolutions@mnbar.org
 Subject: New Online Complaint Kezhaya-Snow
 Date: Wednesday, June 22, 2022 5:47:18 PM

Do not reply to this email.

MINNESOTA
 OFFICE OF LAWYERS PROFESSIONAL RESPONSIBILITY
 COMPLAINT FORM

Complainant Name, Address and Phone Numbers

Complainant 1:
 Mrs. Jessica Snow
 3524 CORNERSTONE ST
 ROUND ROCK, TX 78681
 Email: gypgypsnow@gmail.com
 Cell Phone: (737) 704-7769

Respondent Name, Address and Phone Number

Matthew A. Kezhaya
 333 N. Washington Ave Suite 300
 Minneapolis, MN 55401
 Phone: (479) 431-6112

Additional Information

Relationship to Lawyer: Other

If you are someone other than the client, what is your connection to the lawyer?

Complaint:

On June 9th Mr. Kezhaya emailed a document containing my full legal name (which is something I personally have not used in over 25 years, my legal name is private) and my full home address to no less than 7 people completely unrelated to me or the matter the demand letter was regarding. I am appalled communications were sent to numerous random email addresses with my full legal name and physical address. Considering the general public's heated reaction to things viewed as "Satanic": earlier this week someone set fire to The Satanic Temple: I now have to worry for my and my family's safety as Mr. Kezhaya published my home address in a document that spoke about The Satanic Temple.

His emailed response:

"Objection to personal information

You objected to my use of your legal name and your mailing address in my demand letter. We don't use screen names in the courts, we use legal names." Did not even touch on the justified feelings of insecurity in my home that his careless actions created. I did not object to him using my legal name and address in the document, I took issue with him emailing that same document to strangers. Also I feel compelled to point out: Mr. Kezhaya frequently referred to "Lucien" in our communications and "Lucien" is a non-legal name and also is the screen name for Doug- the leader of The Satanic Temple. I note this only to show it is clear Mr. Kezhaya showed a level of disrespect to me, as he does not require his client to use his legal name in documents.

I noticed in the list of who received this communications it was listed that Mr. Kezhaya "Sent via ; Instagram to satanichousewife; Facebook Messenger to "The Satanic Housewife" a/k/a @roasmind; Twitter to "The Satanic Housewife" a/k/a @satanhousewife" however I do not have any messages in regard to this demand letter on any of the mentioned platforms (inbox or spam), and on one of those platforms my settings expressly disallow anyone I am not connected with to message me. When I asked for dated messages showing this effort, I was told my request was "irrelevant". Without this information it seems Mr. Kezhaya did not send these communications as he claimed, which is an important precedent to set. I feel this is in direct violation of Minnesota Rules of Professional Conduct, Rule 4.1 Truthfulness in Statements to Others.

The demand letter he sent me also stated this letter was mailed to me via "First Class Mail". According to the USPS website First Class Mail takes 1-5 days, and it has been now thirteen days and I still do not have this letter. With the precedent above where it was claimed this demand letter was sent to various places it appears it was not, I feel this is another area where Mr. Kezhaya stated he did something that he did not do. I feel this is in direct violation of Minnesota Rules of Professional Conduct, Rule 4.1 Truthfulness in Statements to Others.

At the end of our communications Mr. Kezhaya sent me what he deemed as an ultimatum. Then he provided a script for me to read on video. This script had statements I had previously objected to and provided evidence for, however he was adamant that if I did not state these things on video then he would move forward with litigation as he had already secured local counsel and was prepared to move swiftly. Some of these sentences were contradictory to statements even Mr. Kezhaya said in his communications to me; E.G. Mr. Kezhaya originally told me that my stating The Satanic Temple had alt-right ties was defamatory because TST(The Satanic Temple)s Head of Ministry ended his friendship with the alt-right celebrity I had mentioned - however in the statement provided to me to read aloud on video Mr. Kezhaya had me state "I know of no credible claims that The Satanic Temple has alt-right ties."

I feel the provided script I was required to read violates Rule 3.4(B) Fairness to Opposing Party & Counsel - "A lawyer shall not: (b) ...counsel or assist witness to testify falsely".

Beyond this, Mr. Kezhaya has been on Reddit making disparaging statements about opposing party in a different case. He stated "I will not answer any questions related to the idiots that call themselves "QueerSatanic," or their idiot-conspiracy theories. My only comment on that topic is: I can't believe you morons have spent more than \$80,000 fighting to keep TST's Facebook page. You are pathetic. You have no concept of civil liberties, or what is at stake by the ever-encroaching theocracy. Your lawyer is a gentleman and a scholar. I hope he squeezes every last penny from you living corpses, and anyone that gives you the time of day."

The original reddit thread can be found here, however the disparaging comments have been removed:
https://www.reddit.com/r/SatanicTemple_Reddit/comments/uy4sv/tst_court_update_may_26_2022_this_one_is_by_tsts/

Those comments are now stored in a webpage archive and can still be seen here:
https://web.archive.org/web/20220527005507/https://www.reddit.com/r/SatanicTemple_Reddit/comments/uy4sv/tst_court_update_may_26_2022_this_one_is_by_tsts/

He may have deleted the comments publicly, but the internet is forever.

For more information on this piece you can see the court filing here: <https://www.courtlistener.com/docket/17042463/38/united-federation-of-churches-llc-v-johnson/>
I feel this is in violation of the ABA Model Rules of Professional Conduct.

Given Mr. Kezhayas history of being sanctioned (located here: <https://www.courtlistener.com/docket/15064653/109/satanic-temple-the-v-belle-plaine-city-of/>) coupled with the issues that I have brought to attention in this complaint, I hope there is some recourse to prevent others from having to go through the same disparaging and cruel treatment from Mr. Kezhaya.

(I will be emailing copies of the demand letter and all my communications with Mr. Kezhaya to this office)

Are you submitting documents with this complaint? Yes

Documents submitted by mail must be received within 7 days to be considered part of the complaint. If this Office does not receive accompanying documents, your complaint may be considered based solely on the information contained in this complaint form.

Dated: 6/22/2022

Additional information and documents must be mailed to:

Office of Lawyers Professional Responsibility
1500 Landmark Towers
345 St. Peter Street
St. Paul, MN 55102
651-296-3952
1-800-657-3601

From: Receptionist, LPRB
To: Peerman, Cindy
Subject: FW: [EXTERNAL] Documents related to my complaint
Date: Thursday, June 23, 2022 7:42:01 AM
Attachments: [1.The Satanic Temple v. Jessica Lynn Snow -- demand letter: for correction clarification or retraction.pdf](#)
[3.The Satanic Temple v. Jessica Lynn Snow -- demand letter: for correction clarification or retraction.pdf](#)
[2.The Satanic Temple v. Jessica Lynn Snow -- demand letter: for correction clarification or retraction.pdf](#)
[2.Evidence.png](#)
[2.2Evidence.png](#)
[4.The Satanic Temple v. Jessica Lynn Snow -- demand letter: for correction clarification or retraction.pdf](#)
[5.The Satanic Temple v. Jessica Lynn Snow -- demand letter: for correction clarification or retraction.pdf](#)
[8.The Satanic Temple v. Jessica Lynn Snow -- demand letter: for correction clarification or retraction.pdf](#)
[6.The Satanic Temple v. Jessica Lynn Snow -- demand letter: for correction clarification or retraction.pdf](#)
[7.The Satanic Temple v. Jessica Lynn Snow -- demand letter: for correction clarification or retraction.pdf](#)
[2022.06.09 DMA Letter \(1\) \(1\).pdf](#)

From: Evie Breedlove <gypgypsnow@gmail.com>
Sent: Wednesday, June 22, 2022 5:49 PM
To: OLPR Complaint Documents <OLPRComplaintDocs@courts.state.mn.us>
Subject: [EXTERNAL] Documents related to my complaint

Hello,

Please see attached.

Thank you,

Evie Breedlove

CAUTION: This email originated from outside the Minnesota Judicial Branch. Do not click links or open attachments unless you recognize the sender and know the content is safe. If this email appears suspicious, or is asking you to provide sensitive information, please do not forward the email; submit the email via the 'Report Message' button on your Outlook ribbon on your computer or contact the ITD Service Desk for further guidance.

6/20/22, 12:52 PM

Gmail - The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction



Evie Breedlove <gypgypsnow@gmail.com>

The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction

Matthew A. Kezhaya <matt@kezhaya.law>

Thu, Jun 9, 2022 at 6:18 PM

To: gypgypsnow@gmail.com, jsnow@geocities.com, jsnowc7@geocities.com, pjsnows47@geocities.com, machiqueco@netscape.net, night_child47302@yahoo.com, Jessi-ca.snow@verizon.net, Jessica.snow@att.net, nightchild@sbcglobal.net

Cc: "Sonia A. Kezhaya" <sonia@kezhaya.law>, Brad Ryynanen <brad@bdrlegal.com>

Please see attached for a demand letter in reference to the above matter.

Matthew A. Kezhaya

Arkansas office:
Kezhaya Law PLC
1202 NE McClain Rd
Bentonville, AR 72712
p: (479) 431-6112
f: (612) 349-2760
e: matt@kezhaya.law

Minnesota office:
Kezhaya Law PLC
333 N Washington Ave, #300
Minneapolis, MN 55401
p: (479) 431-6112
f: (612) 349-2760
e: matt@kezhaya.law

This message may contain confidential or privileged information and was intended for a particular recipient. If it appears that I sent this to you in error, please inform me and delete this message.

 2022 06 09 DMA Letter.pdf
90K

6/20/22, 12:55 PM

Gmail - The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction



Evie Breedlove <gypgypsnow@gmail.com>

The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction

Matthew A. Kezhaya <matt@kezhaya.law>

Mon, Jun 13, 2022 at 6:20 PM

To: Evie Breedlove <gypgypsnow@gmail.com>

Cc: "Sonia A. Kezhaya" <sonia@kezhaya.law>, Brad Ryyanen <brad@bdrlegal.com>

Ms. Snow:

We appreciate your willingness to work with us to undo some of the harm you have done. TST prefers that you post a retraction and correction video over having to litigate this matter. Based on your response, it looks like you also share that preference. This email is to ensure clear expectations for what will suffice as a true retraction and correction.

Claim at 0:20

At issue is this statement: "In a recent court case ... Lucien openly admitted to taking the money fundraised for court cases and for abortion rights advocacy and using it to pay his personal bills instead." We objected because (1) Lucien has never made any statement to the effect of an admission of the underlying claim; (2) the underlying claim is false; and (3) it charges TST (a public charity) with allowing for embezzlement.

You propose amending the statement to an assertion that Greaves received \$4,000 for funds raised for a veterans monument. But it is inadequate to simply amend your statement, you also need to retract your prior statement (*i.e.*, you need to explicitly withdraw the claims and say that they were false). Additionally, your proposed amendment does not correct the original charge of embezzlement. Your proposed amendment continues to falsely imply that Lucien being paid money by TST is improper. The law is the opposite. Lucien is entitled to derive a reasonable income for personal services rendered to the church. IRS Pub. 1828 at 5. Greaves's services to TST are much more than a full-time job. No part of the law expects him to do that job for free. As for the Veteran's Memorial, the funds paid to Greaves were for services related to overseeing the development of the monument. Jarry Depo. at 80:15-19 (Satanic Temple v. Belle Plaine, 0:19-cv-1122 doc. 84-1 at 32).

Based on the above, an agreeable retraction and correction requires all of the following:

- (1) withdraw the claim that "Greaves takes income from money raised for court cases and for abortion rights advocacy and using it to pay his personal bills instead;"
- (2) state that the claim was false in its entirety;
- (3) state that Greaves may lawfully accept reasonable compensation in return for personal services; and
- (4) cite your viewership to IRS Pub. 1828 at 5 for any questions they have about lawful compensation of church officials.
- (5) state that Greaves has not accepted any "income raised for court cases and for abortion rights advocacy and using it to pay his personal bills instead;"
- (6) state that you have no credible basis to believe that TST ever improperly provided compensation to Greaves; and
- (7) state that you have no credible basis to believe that TST ever misrepresented to the public what it was fundraising for or what was done with the funds.

If you insist on addressing the \$4,000 payment from TST to Greaves in relation to the Belle Plaine veterans monument, your video must also include the following:

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- (8) state that Greaves provided TST personal services related to the Display, particularly, he: oversaw development, design, construction, logistics, and transport of the Display for TST;
- (9) state that TST paid Greaves \$4,000 for those personal services; and
- (10) state that you have no credible basis to believe that TST ever misrepresented to the public what it was fundraising for or what was done with the funds.

Claim at 0:41

At issue is this statement: TST is "suing former members to make them be quiet about the stuff they experienced while in the Temple."

We objected because TST is suing those former members because they stole TST's Facebook page.

You propose amending the statement to "Currently The Satanic Temple is threatening legal action against me, as well as suing former members, and the publication Newsweek." Again, it is not sufficient to simply amend your statement, you have to retract it and then correct it. Your proposed amendment still does not correct the false claim. TST is suing the *Johnson* defendants because they stole TST's Facebook pages. We survived their motion to dismiss because the law entitles TST to sue the *Johnson* defendants for stealing TST's Facebook pages.

Based on the above, an agreeable retraction and correction requires the following:

- (1) withdraw the claim that TST is "suing former members to make them be quiet about the stuff they experienced while in the Temple;"
- (2) state that the claim was false in its entirety;
- (3) state that TST is suing the *Johnson* defendants for stealing TST's Facebook pages;
- (4) state that TST's lawsuit against the *Johnson* defendants is proceeding toward a trial for (a) tortious interference with a business relationship and (b) conversion, or trespass to chattels; and
- (5) state that you have no credible basis to believe that TST sues former members "to make them be quiet about stuff they experienced while in the Temple."

If you insist on also addressing TST's threatened litigation against you or the ongoing litigation against Newsweek, your video must also include the following:

- (6) it is actionable defamation to make a false claim with a requisite ill-intent if the false claim causes harm to another;
- (7) you made the false claims which are detailed in our demand letter;
- (8) in response, TST sent you a letter which specified the objectionable claims and demanded a retraction and correction;
- (9) the contemplated video is published in response to TST's letter;
- (10) Newsweek published an article which TST asserts is defamatory;
- (11) Newsweek failed to acquiesce to TST's demand for a retraction and correction; and
- (12) TST is suing Newsweek for defamation.

Claim at 0:51

At issue is this statement: "one of their chapter leaders being accused of sexual assault and TST kicking the victim out of the chapter."

We objected because TST investigated this matter and found (based on eyewitness interviews) that the "victim" falsified the allegation.

You responded that you are willing to retract the statement.

Based on the above, an agreeable retraction and correction requires the following:

- (1) withdraw the claim that one of TST's chapter leaders was accused of sexual assault and TST kicked the victim out of the chapter;
- (2) state that the claim was false;
- (3) state that TST investigated this matter and found (based on eyewitness interviews) that the "victim" falsified the allegation;
- (4) state that your claim was based entirely on hearsay; and

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(5) state that you have no credible basis to believe that TST ever kicked a sexual assault victim out of a chapter for claiming sex assault by a chapter leader.

Claim at 0:57

At issue is this statement: TST's "head of ministry is really good friends with alt-right celebrities like Milo Yiannopoulos."

We objected because TST's head of ministry was friends with Yiannopoulos, long ago, but they have not been friends for many years.

You responded that you are willing to retract the statement.

Based on the above, an agreeable retraction and correction requires the following:

(1) withdraw the claim that TST's "head of ministry is really good friends with alt-right celebrities like Milo Yiannopoulos."

(2) state that the claim was false;

(3) state that you have no credible basis to believe that TST's head of ministry has ever been friends with any alt-right celebrities, other than Milo Yiannopoulos;

(4) state that TST's head of ministry was friends with Yiannopoulos, long ago, but they have not been friends for many years; and

(5) state that you otherwise have no credible basis to believe that TST's head of ministry has any relationship with the alt-right.

Objection to personal information

You objected to my use of your legal name and your mailing address in my demand letter. We don't use screen names in the courts, we use legal names.

Objection to the form of service

You also objected to my failure to send the demand letter via your various social media accounts in addition to sending it by email. Your objection is irrelevant. What matters is that you received fair notice of the request for correction, clarification, or retraction and grounds for the request.

No waiver

Finally, you asked TST to waive its right to file suit *before* you will issue the contemplated "correction, clarification, or retraction" video. Without seeing the actual statement, TST is unable to analyze whether it will correct the harm caused by the subject video. Therefore, TST declines to waive its right to sue.

But, as I mentioned at the top of this email, TST does not want to sue you. TST wants the actionable statements retracted and corrected. So, you should have no concern that TST will bring suit, provided that you act with sincerity and in good faith when creating and publishing the "correction, clarification, or retraction" video.

Matthew A. Kezhaya

Arkansas office:
Kezhaya Law PLC
1202 NE McClain Rd
Bentonville, AR 72712
p: (479) 431-6112
f: (612) 349-2760
e: matt@kezhaya.law

6/20/22, 12:55 PM

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This message may contain confidential or privileged information and was intended for a particular recipient. If it appears that I sent this to you in error, please inform me and delete this message.

[Quoted text hidden]

6/20/22, 12:53 PM

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Evie Breedlove <gypgypsnow@gmail.com>

The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction

Evie Breedlove <gypgypsnow@gmail.com>

Sun, Jun 12, 2022 at 1:37 PM

To: "Matthew A. Kezhaya" <matt@kezhaya.law>

Hello,

Please use this email address (gypgypsnow@gmail.com) if you need to contact me. I am appalled you sent communications to numerous random email addresses with my full legal name and physical address. Considering the general public's heated reaction to things viewed as "Satanic": just last night someone set fire to TST's headquarters: I now have to worry for my and my family's safety as you published my home address. I noticed in the list of who received this communications you listed that you "Sent via ; Instagram to satanichousewife; Facebook Messenger to "The Satanic HouseWife" a/k/a @roasmind; Twitter to "The Satanic Housewife" a/k/a @satanxhousewife" however I do not have any messages in regard to this demand letter on any of the mentioned platforms (inbox or spam), and on one of those platforms my settings expressly disallow anyone I am not connected with to message me; please provide me with a dated copy of these messages.

To the demand letter:

Claim 0:20: I am willing to amend my statement to "The Satanic Temple/Reason Alliance paid Lucien \$4000 from funds raised for a veterans monument". According to the deposition given in Satanic Temple, The v. Belle Plaine, City Of, along with Exhibit 9 found on page 93, this is not a false statement as \$4,000 was used from the funds raised to pay Douglas Mesner/Lucien. For your ease, I have attached a screenshot of pages 80, 82, 83 where this is directly discussed during deposition.

Claim 0:41: I am willing to amend my statement to "Currently The Satanic Temple is threatening legal action against me, as well as suing former members, and the publication Newsweek". This is evidenced by the demand letter I received on June 9th 2022, along with the lawsuit against Queer Satanic, and how TST is also suing Newsweek.

Claim 0:51: I have to acquiesce to this as everything I know would be considered hearsay. I am willing to make that statement in the retraction/clarification video.

Claim 0:57: I will gladly make an updated statement/video that The Satanic Temple wants me to correct my earlier video to reflect that Greg Stevens (the Head of Ministry mentioned) WAS friends with Milo Yiannopoulos.

"TST reserves the right to file suit to the extent that the correction, clarification, or retraction is deemed insufficient"; before I post the amended statements laid out above, that I will say verbatim to what is laid out above, I require a statement from you on behalf of TST that my correction, clarification, or retraction is sufficient and that this matter will not be pursued further. Once this statement is received I will post the clarification video within 24 hours.

-End.

On Thu, Jun 9, 2022 at 6:19 PM Matthew A. Kezhaya <matt@kezhaya.law> wrote:

[Quoted text hidden]

[Quoted text hidden]

 2 attachments

Screen Shot 2022-06-11 at 10.29.46 PM.png
197K

1	Keep them separate from the National	1	By Mr. WELLS.
2	Association of Lawyers, I don't know	2	Q Now, did you see a Exhibit, Exhibit
3	the contents of a report to me by	3	number 2?
4	London.	4	A Yes, Sir.
5	Q And the fact that we had four	5	Q Did you see the photograph of
6	doomed were dead? Please don't say,	6	the actual fact?
7	correct?	7	A Correct.
8	A Yes, Sir.	8	Q And how many were taken in the
9	the actual photo -	9	A And the photograph?
10	A I took four, but I saw	10	Q Wasn't there one in which all the names
11	of the people were written on the	11	of the film, "Wah."
12	back of the photo -	12	Q And you saw one from the opposite
13	direction. And you saw that same in	13	that film, Sir?
14	the film, Sir, the two cases?	14	A Yes, Sir.
15	Q And	15	Q When is that? On what
16	date, did you see what he talked	16	A That - that was with the film
17	about the people in the photograph? So	17	of the film, Sir - I suppose -
18	the back of the building, of the	18	the back of the building, Sir?
19	well, in the end of December.	19	A Yes, Sir, I saw the back of the
20	Q Now, Sir, the National Agent, Sir,	20	development of the film, Sir.
21	was not	21	Q And you saw the back of the film
22	Q And	22	A I saw the names on the back of the
23	Q And on the back of the film, Sir,	23	film, Sir.
24	March 22, 1941, and April 1, 1941.	24	Q Yes, Sir.

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Page 78	Page 80
<p>1 have been a member of the National</p> <p>2 Council at that time. I don't know.</p> <p>3 He's certainly operated in that</p> <p>4 function.</p> <p>5 Q And so the last e-mails we just</p> <p>6 discussed were dated March 2nd, 2017;</p> <p>7 correct?</p> <p>8 A If you say so.</p> <p>9 Q We could put it --</p> <p>10 A -- I apologize, but I just --</p> <p>11 Q -- we can put it back to the -- to the</p> <p>12 end of Exhibit 7 is -- is Bates stamped</p> <p>13 PLF0020. And you see the date there is</p> <p>14 March 2nd, 2017, the last e-mail?</p> <p>15 A Correct.</p> <p>16 Q Okay. And so then we go to Exhibit 8,</p> <p>17 and that's Bates stamped PLF00021. So</p> <p>18 it's sort of the next page, if you</p> <p>19 will, in the stack of documents.</p> <p>20 A Okay.</p> <p>21 Q And this one is dated April 13th, 2017;</p> <p>22 correct?</p> <p>23 A Correct.</p> <p>24 Q And so there's this gap between</p> <p>25 March 2nd, 2017 and April 13th, 2017.</p>	<p>1 By Mr. Mills:</p> <p>2 Q Mr. Jarry, do you see Exhibit 9 on the</p> <p>3 screen there?</p> <p>4 A Yes, I do.</p> <p>5 Q And this says it's an invoice for</p> <p>6 services; correct?</p> <p>7 A Correct.</p> <p>8 Q And it's from Spectacle Films, Inc.?</p> <p>9 A Where do you see that?</p> <p>10 Q You might have to scroll to the bottom.</p> <p>11 A Oh. I see. Okay.</p> <p>12 Q And so is this invoice from Spectacle</p> <p>13 Films, Inc.?</p> <p>14 A No.</p> <p>15 Q Who is it from? Or what?</p> <p>16 A These -- there were fees that were</p> <p>17 actually paid to -- to Lucien for --</p> <p>18 for his work in overseeing the</p> <p>19 development of the -- of the monument.</p> <p>20 Q And -- and so where is Lucien's name on</p> <p>21 this?</p> <p>22 A I assume his name is at the top of the</p> <p>23 document.</p> <p>24 Q Oh, the redaction?</p> <p>25 A Yes.</p>

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Page 82

1 drafting his -- his invoice.

2 And I must have taken an
3 existing document that must have been
4 in the footer of the document, and it
5 should have been deleted. So it's
6 there erroneously.

7 Q What is Spectacle Films?

8 A Spectacle Films is an entity that I
9 own.

10 Q So you own Spectacle Films, Inc.?

11 A That is correct.

12 Q Does anyone else hold ownership
13 interest in it?

14 A No.

15 Q And so this is a -- a business you own.
16 Does it have a relationship with either
17 Reason Alliance or The Satanic Temple?

18 A No.

19 Q So this invoice, you indicated, is for
20 work that Lucien Greaves performed?

21 A That is correct.

22 Q And the fee is \$4,000?

23 A That is correct.

24 Q And was this \$4,000 paid to him?

25 A Yes, it was.

Page 83

1 Q And who paid it?

2 A Reason Alliance.

6/20/22, 12:55 PM

Gmail - The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction



Evie Breedlove <gypgypsnow@gmail.com>

The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction

Evie Breedlove <gypgypsnow@gmail.com>

Mon, Jun 13, 2022 at 8:50 PM

To: "Matthew A. Kezhaya" <matt@kezhaya.law>

Hello,

Forgive my lack of professional email niceties; I've spent all day at various Dr's offices with my autistic toddler seeing if he broke his leg or not, and I have no energy left. I do feel this is important though so I wanted to respond to you asap.

Claim at 0:20

"(6) state that you have no credible basis to believe that TST ever improperly provided compensation to Greaves; and

(7) state that you have no credible basis to believe that TST ever misrepresented to the public what it was fundraising for or what was done with the funds.

(10) state that you have no credible basis to believe that TST ever misrepresented to the public what it was fundraising for or what was done with the funds."

Apologies , and I am sincerely not trying to be difficult, but I cannot speak these statements. What I have learned, read, experienced, heard, etc leaves me in a position to not be able to say those sentences in good faith. I am not looking to state the opposite or anything else on the matter. However, I cannot sincerely say those sentences considering everything mentioned earlier, as well as in Cave v Thurston Lucien spoke of "staying afloat" with TST funds to the tune of \$2,000 at times. Yes, he has the right to do this and no, TST is not transparent with the public about this - I had to read court transcripts to learn it. I am agreeable to reading aloud all the other statements provided regarding this claim.

Claim 0:41

"(3) state that TST is suing the *Johnson* defendants for stealing TST's Facebook pages"

The case is not settled and the right to add "allegedly" still stands. I am agreeable to stating "TST is suing the *Johnson* defendants for allegedly stealing TST's Facebook pages"

I am agreeable to reading aloud all the other statements provided regarding this claim.

Claim 0:51

"(1) withdraw the claim that one of TST's chapter leaders was accused of sexual assault and TST kicked the victim out of the chapter;"

This might be where things go south for our communication, but I will not say this. Which leads to

"(5) state that you have no credible basis to believe that TST ever kicked a sexual assault victim out of a chapter for claiming sex assault by a chapter leader."

I cannot say this either.

I am agreeable to reading aloud all the other statements provided regarding this claim.

Claim 0:57

"(3) state that you have no credible basis to believe that TST's head of ministry has ever been friends with any alt-right celebrities, other than Milo Yiannopoulos;"

I cannot say this. His tenure with Brietbart and his relationship with Milo Y do give me enough credible basis to believe that he may have ever been friends with other alt-right celebrities/personalities in the past. I understand if I were to speak that belief I would most likely receive another letter from y'all, and I have no intentions of repeating this interaction.

"(5) state that you otherwise have no credible basis to believe that TST's head of ministry has any relationship with the alt-right." Adding the word "currently" at the end of this statement is agreeable to me.

I am agreeable to reading aloud all the other statements provided regarding this claim.

"Objection to personal information"

6/20/22, 12:55 PM

Gmail - The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction

You objected to my use of your legal name and your mailing address in my demand letter. We don't use screen names in the courts, we use legal names."

To clarify; I objected to you sending my personal information to multiple email addresses that were in no way associated with me. That action has left me feeling very unsafe in my own home.

"No waiver

Finally, you asked TST to waive its right to file suit *before* you will issue the contemplated "correction, clarification, or retraction" video. Without seeing the actual statement, TST is unable to analyze whether it will correct the harm caused by the subject video. Therefore, TST declines to waive its right to sue." That is completely understandable, and I do not have any other option at this point.

I will read what you wrote in your email to me, on video, linked to the original video which caused this action, with the current (possible) exceptions to those statements listed above in this email. Is this agreeable?

[Quoted text hidden]

6/20/22, 12:56 PM

Gmail - The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction



Evie Breedlove <gypgypsnow@gmail.com>

The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction

Sonia A. Kezhaya <sonia@kezhaya.law>

Tue, Jun 14, 2022 at 11:04 AM

To: gypgypsnow@gmail.com

Cc: "Matthew A. Kezhaya" <matt@kezhaya.law>, Brad Ryynanen <brad@bdrlegal.com>

Ms. Snow:

We appreciate your prompt response and hope all is well with your toddler. Perhaps a phone call could help the parties reach an agreement. Are you amenable to having a phone conversation? If so, I can get that scheduled.

Thank you,

Sonia

----- Forwarded message -----

From: **Evie Breedlove** <gypgypsnow@gmail.com>

Date: Mon, Jun 13, 2022 at 8:51 PM

Subject: Re: The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction

To: Matthew A. Kezhaya <matt@kezhaya.law>

[Quoted text hidden]

6/20/22, 12:56 PM

Gmail - The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction



Evie Breedlove <gyppgypsnow@gmail.com>

The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction

Evie Breedlove <gyppgypsnow@gmail.com>

Fri, Jun 17, 2022 at 2:03 PM

To: "Matthew A. Kezhaya" <matt@kezhaya.law>

Cc: Brad Rynnanen <brad@bdrlegal.com>, "Sonia A. Kezhaya" <sonia@kezhaya.law>

I have made the video requested and used the script provided.

It has been published on my personal TikTok. As requested I have attached it to the original video, as well as attached it to the original video on my Twitter, Facebook, and Instagram. For good faith I have also posted it as its own separate video on those platforms as well.

I am hopeful that by fulfilling the demands we can resolve this matter.

Thank you.

[Quoted text hidden]

6/20/22, 12:56 PM

Gmail - The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction



Evie Breedlove <gypgypsnow@gmail.com>

The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction

Evie Breedlove <gypgypsnow@gmail.com>

Tue, Jun 14, 2022 at 1:23 PM

To: "Sonia A. Kezhaya" <sonia@kezhaya.law>

Cc: Brad Ryyananen <brad@bdrlegal.com>, "Matthew A. Kezhaya" <matt@kezhaya.law>

Hello,

I think a phone call would be best.

Please let me know what time works for you and I will make myself available.

[Quoted text hidden]

--

Thank you! Gypsy Snow

6/20/22, 12:56 PM

Gmail - The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction



Evie Breedlove <gypgypsnow@gmail.com>

The Satanic Temple v. Jessica Lynn Snow -- demand letter; for correction clarification or retraction

Matthew A. Kezhaya <matt@kezhaya.law>

Thu, Jun 16, 2022 at 4:22 PM

To: Evie Breedlove <gypgypsnow@gmail.com>

Cc: "Sonia A. Kezhaya" <sonia@kezhaya.law>, Brad Ryyanen <brad@bdrlegal.com>

Ms. Snow:

On review of our correspondence, I don't think a phone call will be productive. I've come to the conclusion that an ultimatum is the only way we can resolve the impasse. I summarize why below.

Claim at 0:20

You have shifted your claim three times. First, you accused TST of allowing Lucien to embezzle money raised for the limited purpose of court cases and abortion rights advocacy. Then, you accused TST of allowing Lucien to embezzle money raised for the limited purpose of the Belle Plaine Display. Now, you accuse Lucien of embezzling money to "keep afloat." All three of these claims are rooted in the provably-false premise that Lucien accepting compensation from TST is improper. In fact, TST is entitled to pay Lucien reasonable compensation in return for personal services. You have stated a subjective understanding that this is the law. Thus, any claim to the contrary is a knowingly-false statement which causes harm to TST.

Any permutation of a claim that it is improper for Lucien to accept compensation from TST is actionable defamation. "Any permutation" includes veiled statements, innuendo, implication, and any other statement that would cause a reasonable person to believe that TST improperly compensates Lucien. Your objection to transparency is irrelevant. Churches have neither a social obligation nor a legal obligation to be transparent about their payroll. What is prohibited is paying an unreasonable rate, and "\$2,000 here and there" is unimpeachably reasonable for a more-than-full-time job.

Based on the foregoing, you need to make the correction as demanded or I will have to sue you to vindicate TST's rights.

Claim at 0:41

The "allegedly" modifier fails to retract the original provably-false claim that TST is suing the *Johnson* Defendants to "keep them quiet." It is provably-false for you to claim that TST is suing the *Johnson* Defendants because the Defendants "allegedly" stole TST's Facebook page. That is because there is nothing "alleged" about the theft. The *Johnson* Defendants publicly bragged that they "stole" TST's Allies page. **Exhibit 5** at 3; see also **Exhibit 6** (ADJ also admitted to sealing the Chapter page). Facebook publishes all former names of its pages. **Exhibit 3**. The Allies page, which is indisputably in the possession of the *Johnson* Defendants, began as "South Side Satanists: Friends of TST." **Id.** TST is suing to recover the website and for all compensable damages arising out of the interference with TST's exclusive rights to the two pages. Second Amended Complaint at p. 23 (prayer for relief); see also *id.* at Counts 2-4. The Court denied their motion to dismiss for failure to state a claim as to the interferences and the theft. Order at 32.

By failing to include the above necessary context, your proposed correction does not remediate the harm. It is just a veiled restatement of the same actionable claim.

Based on the foregoing, you will make the correction as demanded or I will have to sue you to vindicate TST's rights.

6/20/22, 12:56 PM

Gmail - The Satanic Temple v. Jessica Lynn Snow — demand letter; for correction clarification or retraction

Claim at 0:51

You already stated that your sole basis for your understanding that TST kicked out a sex assault victim is rooted solely in unreliable hearsay. That was an admission to defamation liability. It is too late to retract your prior admission. I am prepared to prove that TST has never kicked a sexual assault victim out of a chapter for claiming sex assault by a chapter leader. I am also prepared to prove that you know that you have flatly zero credible basis to believe that TST has ever kicked a sexual assault victim out of a chapter for claiming sex assault by a chapter leader.

Based on the foregoing, you need to make the correction as demanded or I will have to sue you to vindicate TST's rights.

Claim at 0:57

You now accuse Penemue of having "tenure" at Brietbart. "Tenure" connotes a permanent employment. I am prepared to prove that Penemue's affiliation with Brietbart consists of precisely one article, seven years ago, for which he received no compensation. I am also prepared to prove that you have no basis to you prepared to prove to a jury of your peers that Penemue ever had a permanent employment at Brietbart.

I am also prepared to prove that you have no basis to believe that Penemue had a friendship with any other alt-right celebrities. Your response suggests that you drew an inference to make that claim based on (1) Penemue posted one article on Brietbart; and (2) years ago, Penemue was friends with Yiannopoulos. I am prepared to prove to a jury of your peers that this is not a credible ground to make that claim.

Based on the foregoing, you need to make the correction as demanded or I will have to sue you to vindicate TST's rights.

Objection to personal information

I apologize for making you feel unsafe. I am sensitive to the stigma attached to being a publicly identifiable Satanist. However, you caused my client an actionable harm and it is my job to rectify that harm. Part of my efforts to rectify that harm required me to communicate the original demand letter to you. To communicate the demand letter required (in relevant part) an email address. My best available means to procure your email address was to perform a public records search and send emails to all addresses reflected on the search results. Hopefully, it will resolve your safety concerns to learn that I received bounceback errors from all email addresses other than gypgypsnow@gmail.com.

Ultimatum

This is the last email I intend to send on this matter before filing a complaint. At that point, I foresee that this will become an irresolvable problem without a judgment. The prior email included all necessary elements that will rectify the harm to TST, while strictly keeping to the actionable facts and claims at issue in the objected-to first statement. I strongly prefer to avoid litigation in this matter. But if you do not rectify the actionable harm you caused, I will have no choice but to initiate litigation. I have already retained local counsel on this matter and am prepared to swiftly open the proceedings.

If the itemized matters from the prior email are still an issue, here is a shorter statement that will serve TST's purposes:

The TikTok post I made contained many statements that are provably untrue. I regret having made the post and the harm it has unfairly and unjustly caused The Satanic Temple. I know of no credible claims that The Satanic Temple has ever misappropriated funds. The Satanic Temple's lawsuit against the Johnson defendants who call themselves "Queer Satanic" is over Facebook pages they admitted they stole from The Satanic Temple. I know of no credible claims that The Satanic Temple condones sexual assault or punishes victims of assault. I know of no credible claims that The Satanic Temple has alt-right ties. I sincerely apologize for my hurtful, misleading, and dishonest statements.

Matthew A. Kezhaya

6/20/22, 12:56 PM


Gmail - The Satanic Temple v. Jessica Lynn Snow — demand letter; for correction clarification or retraction

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This message may contain confidential or privileged information and was intended for a particular recipient. If it appears that I sent this to you in error, please inform me and delete this message.

[Quoted text hidden]

 2021 05 24 - 26-6 - exhibit 6.pdf
125K

KEZHAYA LAW PLC

MATTHEW A. KEZHAYA
(479) 431-6112
MATT@KEZHAYA.LAW



333 N. WASHINGTON AVE.,
SUITE 300
MINNEAPOLIS, MN 55401

June 9, 2022

Jessica Lynn Snow
a/k/a @satanichousewife on TikTok
3524 Cornerstone Street
Round Rock, Texas 78681-3727

Sent via email to gypgypsnow@gmail.com, jsnow@geocities.com, jsnowc7@geocities.com, pjsnows47@geocities.com, machiqueco@netscape.net, night_child47302@yahoo.com, Jessica.snow@verizon.net, Jessica.snow@att.net, nightchild@sbcglobal.net; Instagram to satanichousewife; Facebook Messenger to "The Satanic HouseWife" a/k/a @roasmind; Twitter to "The Satanic Housewife" a/k/a @satanxhousewife; and First Class Mail.

Re: *The Satanic Temple v. Jessica Lynn Snow*, Demand Letter and Request for Correction, Clarification, or Retraction

Ms. Snow:

If you have representation in this matter, please forward this letter to your attorney and request that they contact me. I serve as general counsel for The Satanic Temple, Inc. ("TST"). I have been made aware of a recent TikTok video of yours,¹ in which you make certain provably-false statements of fact about my client which have a tendency to harm my client's reputation. The purpose of my letter is to inform you that these statements you have made are actionable, and that litigation will ensue unless you publish a correction, clarification, or retraction of the defamatory statements on TikTok, and any other platform on which you have shared the video, within three days.

In your video, beginning at about 0:20, you state: "In a recent court case ... Lucien openly admitted to taking the money fundraised for court cases and for abortion rights advocacy and using it to pay his personal bills instead." Your statement is false. Lucien has never made any statement to the effect of an admission to "taking money fundraised for court cases and for abortion rights

¹available at: <https://www.tiktok.com/@thesatanichousewife/video/7093692392297041194> (last visited June 8, 2022) originally published on or about May 3, 2022.

advocacy and using it to pay his personal bills instead.” Your false statement is defamatory because it charges TST (a public charity) with allowing for embezzlement, which is a serious charge of fraud.

Next, beginning at about 0:41, you claim that TST is “suing former members to make them be quiet about the stuff they experienced while in the Temple.” Your statement is false. TST is suing those former members because they stole TST’s property and, using that stolen property, channeled provably-false and harmful statements directly at TST’s audience, which statements were made for the wrongful purpose of diverting TST’s donation base to the former members’ new competitor organization. Your false statement is defamatory because it wrongly paints TST as being abusive against its former members, which tends to diminish the public trust in TST as a religious organization.

Next, at approximately 0:51, you claim that “one of their chapter leaders being accused of sexual assault and TST kicking the victim out of the chapter.” This statement is patently false. It is defamatory because it suggests that TST supported a person in a leadership position within the organization who was accused of sexual assault by removing the accuser. This is in direct contrast to TST’s actual conduct, and it harms the reputation of TST with its current membership, with potential members, and with the public at large. As you have first-hand knowledge, TST investigated this matter and found (based on eyewitness interviews) that the “victim” falsified the allegation.

Last, at about 0:57, you claim that TST’s “head of ministry is really good friends with alt-right celebrities like Milo Yiannopoulos.” Your statement is false. TST’s head of ministry *was* friends with Yiannopoulos, long ago, but they have not been friends for many years. Without necessary context, the statement is false. Your false statement is defamatory in the overall context of the video because the kinds of people who are likely to donate to TST in support of the Religious Reproductive Rights campaign are politically averse to Yiannopoulos and will therefore be deterred from donating to TST by a misbelief that there are secret ties between TST and him.

Because litigation may become necessary, you are obligated to refrain from destroying or deleting any social media accounts, any media storage devices (*e.g.*, phones or laptops), and any communication you may have had with third parties about TST or the matters in your video. If information relevant to a known potential lawsuit is missing, it may be presumed to be harmful to the person who failed to preserve the information. *See Brookshire Bros., Ltd. v. Aldridge*, 438 S.W.3d 9 (Tex. 2014).

As noted above, we intend to file suit unless you publish a sufficient correction, clarification, or retraction of the defamatory statements on TikTok, and any other platform on which you have shared the video (such as Facebook, Instagram, Twitter, Discord, Reddit, or any other platform), within three days, including a link to the original video so that it is likely to be seen by those who have viewed the original video. TST reserves the right to file suit to the extent that the correction, clarification, or retraction is deemed insufficient under the Texas Defamation Mitigation Act.

Please notify me if you intend to acquiesce to this letter. If I do not hear from you by the deadline, I will assume that you intend to defend your video in court.

Sincerely,

Matthew A. Kezhaya